U. S. Environmental Protection Agency

Office of Enforcement and Compliance Assurance

Cleveland Section

Concentrated Animal Feed Operation Inspection

Ottawa Holsteins, L.L.C.

October 19, 2017

Paul J. Novak, Jr. 10-19-17

Inspector: Paul J. Novak, Jr., Geologist — Date

10-19-17

Approved by: Brooke Furio, Chief, Cleveland Office — Date

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
25063 CENTER RIDGE ROAD
WESTLAKE, OH 44145-4114

October 19, 2017

MEMORANDUM

SUBJECT: Concentrated Animal Feeding Operation, Follow-up inspection, Ottawa Holsteins, L.L.C., Ottawa, Ohio

FROM: Paul J. Novak, Jr., Geologist

THRU: Mark Conti, Lead Environmental Engineer (ME-W)

TO: Ryan Bahr, Water Enforcement and Compliance Assurance Branch, Section 2, WC-15J

On July 13, 2017, Jonathon Moody, U. S. EPA, and I performed a follow-up inspection of the Ottawa Holsteins, L.L.C. The facility is located at Ex. 6 (Personal Privacy) Ottawa, Ohio.

Attached is a summary of our findings at the facility. If you have any questions, please contact me.

Attachment

U. S. Environmental Protection Agency
Region 5
Office of Enforcement and Compliance Assurance
Cleveland Section

I. Facility Identification

A. Facility Name and Address

Ottawa Holsteins, L. L. C.
Ex. 6 (Personal Privacy)

B. Facility Contact

Ex. 6 (Personal Privacy)
Ex. 6 (Personal Privacy)
Ex. 6 (Personal Privacy)

C. Receiving Waters

Maumee River via Blanchard River via unnamed tributaries

D. Dates of Inspection

July 13, 2017

II. Participants

A. Facility

Ex. 6 (Personal Privacy) - Owner
Ex. 6 (Personal Privacy) Co-owner

B. U. S. EPA

Paul J. Novak, Jr. - Geologist
Jonathon Moody – Environmental Engineer

C. Ohio Department of Agriculture

John Schroder – Livestock Regulator

D. Putnam Soil and Water Conservation District

Curtis Kobe – District Conservationist

III. Objective

This inspection was conducted as part of a request from U. S. EPA Region 5 Water Division for the fiscal year 2017 as a follow-up to our FY 2016 inspection.

IV. Summary of Findings

We entered the facility on July 13, 2017, and were met by Mr. Ex. 6 (Personal Privacy), son, of the owners, Ex. 6 (Personal Privacy) of Ottawa Holsteins, L.L.C. We presented credentials to him and explained our purpose to him. Attachment 1 contains a location map of the facility.

The facility is a medium CAFO for dairy cows. At the time of our inspection, Mr. Ex. 6 (Personal Privac told us that there were around four hundred mature cows with about three-hundred and fifty being milked. He also said there were about 200 immature cows on site.

We decided to inspect the contaminated storm water pond which is on the east side of the facility (see aerial photograph and location map in Attachment 1). There was waste water flowing out of the pond on its east side (see photograph in Attachment 2). The flow out of the pond merged with flow from a swale along the east side of the facility. We followed the swale to a topographic low point along the south property boundary where the water was pooled (see short videos on CD-ROM in Attachment 3). We could observe no physical outlet for the pool which straddled the Ottawa Holsteins property and another property owner's field immediately to the south. That property is owned by Ex. 6 (Personal Privacy)

In a phone conversation on August 14, 2017, with Ex. 6 (Personal Privacy) he told me that he had found a record that his father had made of the tile that was put in the field. He said that the tile was put in many years ago, was clay vitreous tile, and the tiles were run east to west. He also said that the tile was four to five feet below the surface and had an outlet into a ditch along highway 65. He further said that when he put the beans down in the spring that were no tile blow-outs in the field.

We collected Sample S01 at the outlet point of the contaminated storm water pond. All parameters with the exception of fecal coliform/E. Coli were collected as per the "FY 2017 General Field Sampling Plan". We split samples with the facility. Table 1 in Attachment 4 contains results of field parameters collected with a YSI 556 multi-parameter meter.

Results from the samples sent to the Region 5 Chicago Regional Laboratory (CRL) are summarized in Table 2 in Attachment 5. CRL's data sheets are in Attachment 6.

Attachment 7 contains a copy of the U. S. EPA Form 3560-3. Attachment 8 contains a copy of the U. S. EPA Inspection Conclusion Data Sheet Form.

List of Attachments

1. Aerial Photograph and Location Map
2. Photographs
3. CR-Rom with raw photographs and videos
4. Table 1; Results of Field Parameter Analysis
5. Table 2, Results of Sample S01 Analyses
6. Chicago Regional Laboratory Data Sheets
7. U. S. EPA form 3560-3
8. U. S. EPA Inspection Conclusion Data Sheet form

ATTACHMENT 1

McConnel Cem

New Cleveland Sch

BM 739

Kildaire Country Club

Pike Run

OLD INDIAN TREATY BOUNDARY

BM 745

BM 766

Ottawa Holsteins

OHIO AND IRONTON

BM 775

BALTIMORE AND TOLEDO

BM 728

Microwave Tower

O T T A W A

Trailer Park

Drive-in Theater

DETROIT

Sewage Disposal

St Johns Cem

BM 740

Radio Tower

PARK

BM 732

Substation

Tawa Run

Water

Pk

OTTAWA

SS Peter and Paul Cem

BM 727

County Fairground

BLANCHARD RIVER

BM 735

Radio Tower

Riley Creek

(COLUMBUS GROVE) 4165 I NE

SCALE 1:24000

1 MILE

COLUMBUS GROVE 5.5 MI.
LIMA (P.O.) 19 MI.

ROAD CLASSIFICATION

INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.—1974

T. 2 N

T. 1 N

LEIPSIC 4.2 MI.
MC CLURE 25 MI. S IV

GILBOA 4.2 MI.
FINDLAY 21 MI.


Ex. 6 (Personal Privacy)

ATTACHMENT 2

United States Environmental Protection Agency

Digital Image Log

Name: JM/PJN

Date: 07/13/2017

Case Number: Ottawa Holsteins

Image Number	Photo No.	Description
IMG_0001.jpg	1	Looking southerly at overflow from contaminated storm water pond (on right) going into swale that flows south into field.
IMG_0002.jpg	2	Looking southerly at overflow from contaminated storm water pond (on right) going into swale that flows south into field.
IMG_0003.jpg	3	Mixing of water from contaminated storm water pond and ditch.
IMG_0005.jpg	4	Storm water ditch on east side of contaminated storm water pond.
IMG_0006.jpg	5	Storm water ditch on east side of contaminated storm water pond looking north.
IMG_0007.jpg	6	Storm water ditch carrying liquid from contaminated storm water pond looking south.
IMG_0008.jpg	7	End point of ditch in above photograph along south edge of property.
IMG_0009.jpg	8	Pool of water at end of ditch carrying water from contaminated storm water pond overflow and field runoff. View is looking west. Fence line is edge of Ottawa Holsteins property.
IMG_0010.jpg	9	Pool of water at end of ditch carrying water from contaminated storm water pond overflow and field runoff. View is looking west/southwest. Fence line is edge of Ottawa Holsteins property.
IMG_0012.jpg	10	View looking east along property boundary (Ottawa Holsteins property to left). Pool of water in photograph 8 is immediately behind photographer.
IMG_0014.jpg	11	Sample S01 taken at overflow point of contaminated storm water pond overflow to ditch.
IMG_0015.jpg	12	Sample S01 taken at overflow point of contaminated storm water pond overflow to ditch.
IMG_0016.jpg	13	Sample S01.
IMG_0017.jpg	14	Last portion of sample S01 taken at overflow point of contaminated storm water pond overflow to ditch.
Digital Movies		Included on attached CD_ROM
MVI_0004.MOV		Digital movies showing cloudy liquid from contaminated storm water pond and dich water (at top of view).
MVI_0004.THM		Thunmbnail
MVI_0011.MOV		Digital movies of pool of water at end of ditch that carries contaminated storm water from contaminated storm water pond. View looks mostly westward.
MVI_0011.THM		Thunmbnail
MVI_0013.MOV		Digital movie showing pool of water at end of ditch that carries contaminated storm water from contaminated storm water pond. View starts looking north at contaminated storm water pond, the cover pool and looks around from north through east, south and westward.
MVI_0013.THM		Thunmbnail

Photograph 1 of 14. Looking southerly at overflow from contaminated storm water pond (on right) going into swale that flows south into field. JM, 07/13/17, 1044 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 2 of 14. Looking southerly at overflow from contaminated storm water pond (on right) going into swale that flows south into field. JM, 07/13/17, 1045 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 3 of 14. Mixing of water from contaminated storm water pond and ditch. JM, 07/13/17, 1045 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 4 of 14. Storm water ditch on east side of contaminated storm water pond. JM, 07/13/17, 1051 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 5 of 14. Storm water ditch on east side of contaminated storm water pond looking north. JM, 07/13/17, 1051 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 6 of 14. Storm water ditch carrying liquid from contaminated storm water pond looking south. JM, 07/13/17, 1051 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

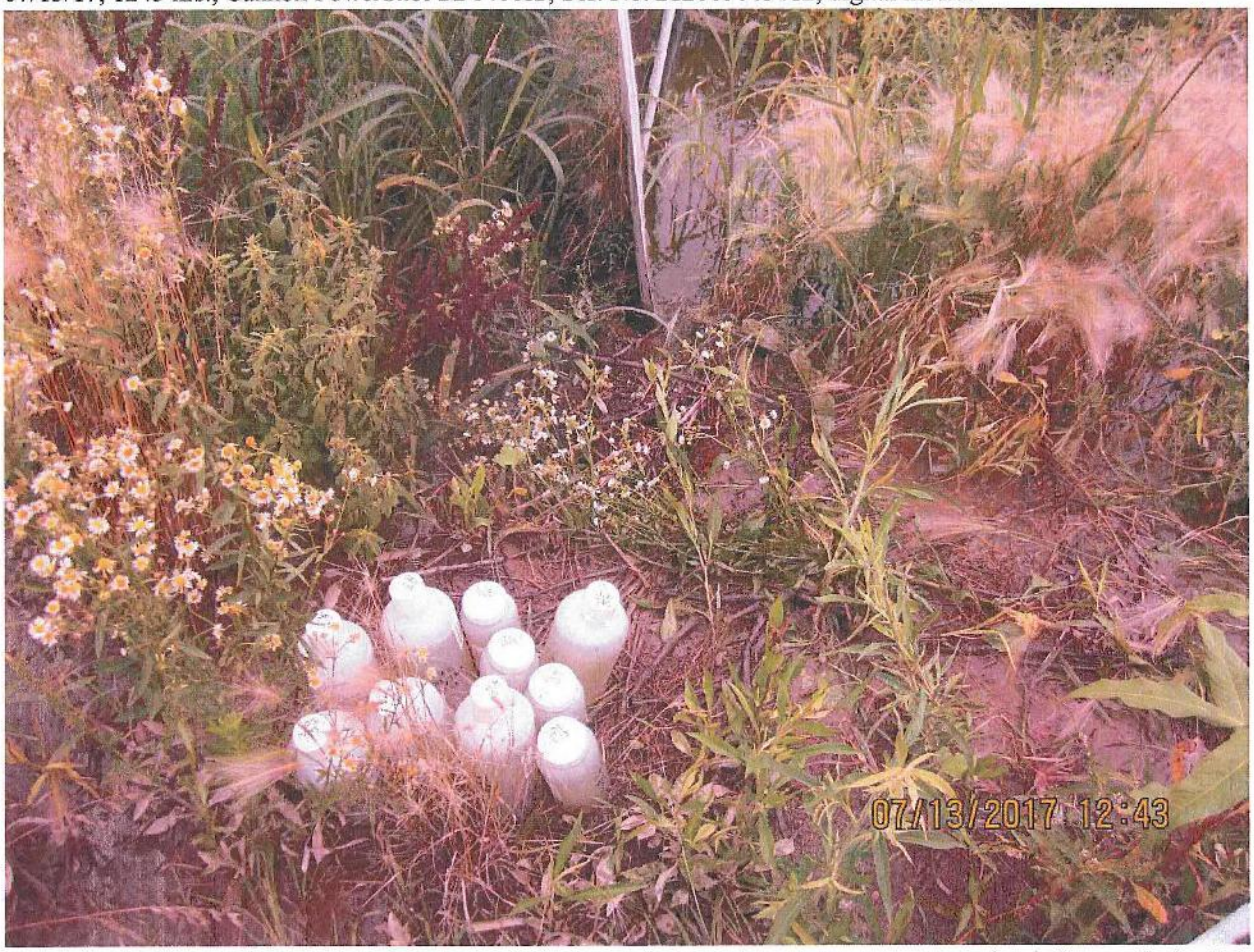
Photograph 7 of 14. End point of ditch in above photographs along south edge of property. JM, 07/13/17, 1054 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 8 of 14. Pool of water at end of ditch carrying water from contaminated storm water pond overflow and field runoff. View is looking west. Fence line is edge of Ottawa Holsteins property. JM, 07/13/17, 1054 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 9 of 14. Pool of water at end of ditch carrying water from contaminated storm water pond overflow and field runoff. View is looking west/southwest. Fence line is edge of Ottawa Holsteins property. JM, 07/13/17, 1054 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 10 of 14. View looking east along property boundary (Ottawa Holsteins property to left). Pool of water in photograph 8 is immediately behind photographer. JM, 07/13/17, 1059 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 11 of 14. Sample S01 taken at overflow point of contaminated storm water pond overflow to ditch. JM, 07/13/17, 1243 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.



Photograph 12 of 14. Sample S01 taken at overflow point of contaminated storm water pond overflow to ditch. JM, 07/13/17, 1243 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 13 of 14. Sample S01. JM, 07/13/17, 1244 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

Photograph 14 of 14. Last portion of sample S01 taken at overflow point of contaminated storm water pond overflow to ditch. JM, 07/13/17, 1252 hrs., Cannon PowerShot SD1400IS, Ser. No. 212065043412, digital media.

ATTACHMENT 3

ATTACHMENT 4

Ottawa Holsteins
July 13, 2017 Sampling from contaminated storm water pond
Sample collected July 13, 2017 at 1243 hours

Field Parameters	Sample S01
pH	7.38 S.U.
Conductivity	553 µS/cm
Dissolved Oxygen	7.98 mg/L
Temperature	25.61 ˚C

All field parameters analyzed using YSI Model 556 Multparameter instument

ATTACHMENT 5

Ottawa Holsteins
July 13, 2017 Sampling from overflow from contaminated storm water pond
Sample collectedJuly 13, 2017 at 1243 hours

Paramater	Sample S01	Blank R02
Total P	5.31 mg/L	U
Ammonia as N	0.59 mg/L	U
Nitrate-Nitrite N	0.87 mg/L	U
TKN	11.9 mg/L	2.06 mg/L
TSS	127 mg/l	U
TDS	412 mg/l	U
BOD	40 mg/L	U

U = Not Detected
All samples analyzed by Region 5's Chicago

ATTACHMENT 6

Environmental Protection Agency Region 5

Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

WORK ORDER

Printed: 8/22/2017 8:03:18AM

1707007

US EPA Region 5 Chicago Regional Laboratory

Client:	**Office of Enforcement and Compliance Assurance**	**Project Manager:**	**Angela Ockrassa Davis**
Project:	**Ottawa Holsteins**	**Project Number:**	**CN-02-17**

Report To:

Paul Novak	77 W. Jackson	Phone: (440) 250-1714
Office of Enforcement and Compliance Assurance	Chicago, IL 60604	Fax: (312) 886-2591

Date Due:	Aug-28-17 15:00 (45 day TAT)		
Received By:	Robert Snyder	Date Received:	Jul-14-17 10:30
Logged In By:	Robert Snyder	Date Logged In:	Jul-14-17 11:04

Samples Received at:	2.3 °C	Work Order Comments:
Sample tags/labels	Yes	
Seals Intact	Yes	
Received on ice	Yes	
Paperwork Included	Yes	

Sample ID: 1707007-01 **Sampled:** Jul-13-17 12:43 **Matrix:** Water

Sample Name: S01 **Sample Location/Comments:** Discharge at stm. pond

Analysis	Hold time (days)	Expires	Comments
Ammonia N DA, Distilled	28	Aug-10-17 12:43	pH = 1
BOD	2	Jul-15-17 12:43	pH = 7
Nitrate-Nitrite N DA, Enzymatic reduction	28	Aug-10-17 12:43	pH = 1
Solids, TDS	7	Jul-20-17 12:43	pH = 7
Solids, TSS	7	Jul-20-17 12:43	pH = 7
TKN DA	28	Aug-10-17 12:43	pH = 1
Total Phosphorus DA	28	Aug-10-17 12:43	pH = 1

Sample ID: 1707007-02 **Sampled:** Jul-13-17 13:14 **Matrix:** Water

Sample Name: R02 **Sample Location/Comments:** Field blank

Analysis	Hold time (days)	Expires	Comments
Ammonia N DA, Distilled	28	Aug-10-17 13:14	pH = 1
BOD	2	Jul-15-17 13:14	pH = 5
Nitrate-Nitrite N DA, Enzymatic reduction	28	Aug-10-17 13:14	pH = 1
Solids, TDS	7	Jul-20-17 13:14	pH = 5
Solids, TSS	7	Jul-20-17 13:14	pH = 5
TKN DA	28	Aug-10-17 13:14	pH = 1
Total Phosphorus DA	28	Aug-10-17 13:14	pH = 1

Reviewed By _____ Date _____

WORK ORDER

Printed: 8/22/2017 8:03:18AM

1707007

US EPA Region 5 Chicago Regional Laboratory

Client:	Office of Enforcement and Compliance Assurance	Project Manager:	Angela Ockrassa Davis
Project:	Ottawa Holsteins	Project Number:	CN-02-17

Sample ID: 1707007-02 Sampled: Jul-13-17 13:14 Matrix: Water

Sample Name: R02 Sample Location/Comments: Field blank

Analysis	Hold time (days)	Expires	Comments

Reviewed By

Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CHICAGO REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

LABORATORY ACCREDITATION BUREAU
ACCREDITED ISO/IEC 17025
Certificate # L2280 Testing

Date: 8/22/2017

Subject: Review of Region 5 Data for Ottawa Holsteins

To: Office of Enforcement and Compliance Assurance
77 W. Jackson
Chicago, IL 60604

From: Anna Knoebel, Chemist
US EPA Region 5 Chicago Regional Laboratory

The data transmitted under this cover memo successfully passed CRL's data review procedures as documented in the current Quality Management Plan and applicable Standard Operating Procedures. In accordance with the EPA QA/G-8 *Guidance on Environmental Data Verification and Data Validation* and the U.S. EPA Region 5 RMD QMP, CRL performs data verification on all the data generated internally. CRL does not perform data validation or quality assessment procedures.

This report was reviewed and the information provided herein accurately represents the analysis performed.

X Anna Knoebel

Please contact the analyst with any technical report issues, Robert Thompson at (312)-353-9078 for sample project concerns, and Sylvia Griffin at (312)-353-9073 with data transmittal questions. Thank you.

Attached are Results for: Ottawa Holsteins

/ /

Data Coordinator and Date Transmitted

Analyses included in this report:

Ammonia N DA, Distilled

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-22-17 07:48

ANALYSIS CASE NARRATIVE – Distilled Ammonia Nitrogen in Water

Work Order: 1707007
Analyst: Anna Knoebel
Phone #: (312) 353-9467

General Information

Two water samples for Ammonia Nitrogen were received on July 14, 2017. All holding times were met.

Sample Analysis and Results

The samples were distilled and analyzed on August 1, 2017 for Ammonia Nitrogen in water using CRL SOP AIG029B, Version # 5 (based on method 4500 – NH3- B & H). The samples were stored in the refrigerator at all times, except when in use.

The data reported herein meets any laboratory specifications referenced in the sampling QAPP "*FY 2017 General Field Sampling Plan 02132017*" and "*2014 reporting request for CAFO samples 062014.*" The data reported herein also meets the requirements referenced in CRL SOP AIG029B, Version # 5 (based on method 4500 – NH3- B & H).

Quality Control

All quality control audits were within CRL limits or did not result in qualification of the data.

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-22-17 07:48

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S01	1707007-01	Water	Jul-13-17 12:43	Jul-14-17 10:30
R02	1707007-02	Water	Jul-13-17 13:14	Jul-14-17 10:30

Ammonia Nitrogen, SM4500B & H (modified)
US EPA Region 5 Chicago Regional Laboratory

S01 (1707007-01) **Matrix: Water** **Sampled: Jul-13-17 12:43** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Ammonia as N	**0.59**		0.12	0.20	mg/L	1	B17H001	Aug-01-17	Aug-01-17

R02 (1707007-02) **Matrix: Water** **Sampled: Jul-13-17 13:14** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Ammonia as N	U		0.12	0.20	mg/L	1	B17H001	Aug-01-17	Aug-01-17

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-22-17 07:48

Notes and Definitions

U	Not Detected
NR	Not Reported
Q	QC limit Exceeded

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5 CHICAGO REGIONAL LABORATORY
536 SOUTH CLARK STREET
CHICAGO, ILLINOIS 60605

Date: 8/22/2017

Subject: Review of Region 5 Data for Ottawa Holsteins

To: Office of Enforcement and Compliance Assurance
77 W. Jackson
Chicago, IL 60604

From: Anna Knoebel, Chemist
US EPA Region 5 Chicago Regional Laboratory

The data transmitted under this cover memo successfully passed CRL's data review procedures as documented in the current Quality Management Plan and applicable Standard Operating Procedures. In accordance with the EPA QA/G-8 *Guidance on Environmental Data Verification and Data Validation* and the U.S. EPA Region 5 RMD QMP, CRL performs data verification on all the data generated internally. CRL does not perform data validation or quality assessment procedures.

This report was reviewed and the information provided herein accurately represents the analysis performed.

X Anna Knoebel

Please contact the analyst with any technical report issues, Robert Thompson at (312)-353-9078 for sample project concerns, and Sylvia Griffin at (312)-353-9073 with data transmittal questions. Thank you.

Attached are Results for: Ottawa Holsteins

/ /

Data Coordinator and Date Transmitted

Analyses included in this report:

Nitrate-Nitrite N DA, Enzymatic reduction

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	Reported:
Chicago IL, 60604	Project Manager: Paul Novak	Aug-22-17 08:00

ANALYSIS CASE NARRATIVE – Nitrate-Nitrite Nitrogen in Water

Work Order: 1707007
Analyst: Anna Knoebel
Phone #: (312) 353-9467

General Information

Two water samples for Nitrate-Nitrite Nitrogen were received on July 14, 2017. All holding times were met.

Sample Analysis and Results

The samples were analyzed for Nitrate-Nitrite Nitrogen in water on August 2, 2017 using CRL SOP AIG031B, Version # 3 (SOP based on ASTM D7781-14). The samples were stored in the refrigerator at all times except when in use.

A new SOP (AIG031B) which follows ASTM method D7781-14 (*Standard Test Method for Nitrate-Nitrite in Water by Nitrate Reductase*) was added in August of 2015. This method is different than the method referenced in the sampling QAPP "*FY 2017 General Field Sampling Plan 02132017.*" The data reported herein meets any laboratory specifications referenced in the sampling QAPP, sampling plan "*2015 General Field Sampling Plan 040715,*"and the requirements referenced in CRL SOP AIG031B, Version # 3 (based on ASTM D7781-14).

Quality Control

All quality control audits were within CRL limits or did not result in qualification of the data.

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-22-17 08:00

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S01	1707007-01	Water	Jul-13-17 12:43	Jul-14-17 10:30
R02	1707007-02	Water	Jul-13-17 13:14	Jul-14-17 10:30

Nitrate-Nitrite Nitrogen, Nitrate Reductase, ASTM D7781 - 14 (modified)
US EPA Region 5 Chicago Regional Laboratory

S01 (1707007-01) **Matrix: Water** **Sampled: Jul-13-17 12:43** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Nitrate-Nitrite N	**0.87**		0.04	0.10	mg/L	1	B17I1005	Aug-02-17	Aug-02-17

R02 (1707007-02) **Matrix: Water** **Sampled: Jul-13-17 13:14** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Nitrate-Nitrite N	**U**	U	0.04	0.10	mg/L	1	B17H005	Aug-02-17	Aug-02-17

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-22-17 08:00

Notes and Definitions

U	Not Detected
NR	Not Reported
Q	QC limit Exceeded

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CHICAGO REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

LABORATORY ACCREDITATION BUREAU
ACCREDITED ISO/IEC 17025
Certificate # L2280 Testing

Date: 8/23/2017

Subject: Review of Region 5 Data for Ottawa Holsteins

To: Office of Enforcement and Compliance Assurance
77 W. Jackson
Chicago, IL 60604

From: Nidia Fuentes, Chemist
US EPA Region 5 Chicago Regional Laboratory

The data transmitted under this cover memo successfully passed CRL's data review procedures as documented in the current Quality Management Plan and applicable Standard Operating Procedures. In accordance with the EPA QA/G-8 *Guidance on Environmental Data Verification and Data Validation* and the U.S. EPA Region 5 RMD QMP, CRL performs data verification on all the data generated internally. CRL does not perform data validation or quality assessment procedures.

This report was reviewed and the information provided herein accurately represents the analysis performed.

X Nidia Fuentes 08/23/2017

Please contact the analyst with any technical report issues, Robert Thompson at (312)-353-9078 for sample project concerns, and Sylvia Griffin at (312)-353-9073 with data transmittal questions. Thank you.

Attached are Results for: Ottawa Holsteins

/ /

Data Coordinator and Date Transmitted

Analyses included in this report:

TKN DA

Total Phosphorus DA

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-23-17 13:50

Analysis Case Narrative

General Information

A total of two water sample to be analyzed for Total Phosphorus (TP) were received at the Chicago Regional Laboratory on July 14, 2017. The samples were analyzed within the holding time. The designated analyst for the samples is Nidia Fuentes. Nidia can be reached at 312-353-9079.

Sample Analysis and Results

The data reported herein meets any laboratory specifications referenced in the sampling QAPP "FY 2017 General Field Sampling Plan 02132017" and the limits referenced in CRL SOP AIG034B Version #4 (based on EPA method 365.4).

Quality Control

All quality control audits were within the CRL's limits.

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-23-17 13:50

Analysis Case Narrative

General Information

A total of two water samples, to be analyzed for Total Kjeldahl Nitrogen (TKN), were received at the Chicago Regional Laboratory on July 14, 2017. The samples were digested and analyzed using CRL SOP AIG035B, Version #6 (based on EPA method 351.2). All holding times were met. The designated analyst for these samples is Nidia Fuentes. Nidia can be reached at 312-353-9079.

Sample Analysis and Results

The data reported herein meets any laboratory specifications referenced in the sampling QAPP "FY 2017 General Field Sampling Plan 02132017", and the limits referenced in CRL SOP AIG035B Version #6 (based on EPA method 351.2).

Quality Control

All quality control audits were within the CRL limits, with the exception of sample matrix spike.

Sample 1707007-01 (S01) matrix spike recovery exceeded QC limits (90 - 110%). Sample and its QC were diluted 10X and the spike concentration was diluted out. No qualifier was applied.

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-23-17 13:50

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S01	1707007-01	Water	Jul-13-17 12:43	Jul-14-17 10:30
R02	1707007-02	Water	Jul-13-17 13:14	Jul-14-17 10:30

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-23-17 13:50

Phosphorus, Colorimetric, EPA 365.4 (modified)
US EPA Region 5 Chicago Regional Laboratory

S01 (1707007-01) **Matrix: Water** **Sampled: Jul-13-17 12:43** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Phosphorus	5.31		0.40	1.50	mg/L	10	B17G054	Jul-27-17	Aug-01-17

R02 (1707007-02) **Matrix: Water** **Sampled: Jul-13-17 13:14** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Phosphorus	U		0.04	0.15	mg/L	1	B17G054	Jul-27-17	Aug-01-17

Environmental Protection Agency Region 5
Chicago Regional Laboratory

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Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-23-17 13:50

Total Kjeldahl Nitrogen, EPA 351.2 (modified)
US EPA Region 5 Chicago Regional Laboratory

S01 (1707007-01) **Matrix: Water** **Sampled: Jul-13-17 12:43** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Kjeldahl Nitrogen	**11.9**		2.00	5.00	mg/L	10	B17G055	Jul-27-17	Aug-01-17

R02 (1707007-02) **Matrix: Water** **Sampled: Jul-13-17 13:14** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Kjeldahl Nitrogen	**2.06**		0.20	0.50	mg/L	1	B17G055	Jul-27-17	Aug-01-17

Environmental Protection Agency Region 5
Chicago Regional Laboratory

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Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Aug-23-17 13:50

Notes and Definitions

U	Not Detected
NR	Not Reported
Q	QC limit Exceeded

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CHICAGO REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

LABORATORY ACCREDITATION BUREAU ACCREDITED ISO/IEC 17025

Certificate # L2280 Testing

Date: 10/3/2017

Subject: Review of Region 5 Data for Ottawa Holsteins

To: Office of Enforcement and Compliance Assurance
77 W. Jackson
Chicago, IL 60604

From: Francis Awanya, Chemist
US EPA Region 5 Chicago Regional Laboratory

The data transmitted under this cover memo successfully passed CRL's data review procedures as documented in the current Quality Management Plan and applicable Standard Operating Procedures. In accordance with the EPA QA/G-8 *Guidance on Environmental Data Verification and Data Validation* and the U.S. EPA Region 5 RMD QMP, CRL performs data verification on all the data generated internally. CRL does not perform data validation or quality assessment procedures.

This report was reviewed and the information provided herein accurately represents the analysis performed.

X Francis A Awanya 10/3/2017

Please contact the analyst with any technical report issues, Robert Thompson at (312)-353-9078 for sample project concerns, and Sylvia Griffin at (312)-353-9073 with data transmittal questions. Thank you.

Attached are Results for: Ottawa Holsteins

/ /

Data Coordinator and Date Transmitted

Analyses included in this report:

BOD

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Oct-03-17 17:18

Analysis Case Narrative

General Information

Two (2) water samples collected for the project were received at the Chicago Regional Laboratory (CRL) on 07/14/2017. The samples were analyzed for Biochemical Oxygen Demand (BOD) in water using Standard Operating Procedure (SOP) CRL Document # AIG006 Version # 4 (Based on SM 5210 B (APHA, AWWA, WEF)). The designated analyst for those samples is Francis Awanya. Francis can be reached at 312-886-3682. Other pertinent information and dates are provided in the final analysis report. Analysis was completed within the holding time.

Sample Analysis and Results

The data reported herein meet the requirements of QAPP "FY 2017 General Field Sampling Plan 02132017" and "2014 reporting request for CAFO samples 062014".

Quality Control

All required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the CRL's QC limits with the following exceptions.

Dilution water blanks: A pair of dilution water with no seed (DWNS) incubated with the samples produced oxygen depletions of 0.45 mg/L and 0.38 mg/L exceeding the limit of 0.2 mg/L. Similarly, the seeded dilution water (DWS) produced depletions of 0.72 mg/L and 0.65 mg/L. BOD result for field sample 1707007-01 (Field Sample Number S01) was more than ten times the amount found in the blank and that of sample1707007-02 (Field Sample Number R02) was less than detection. Both results are not considered to be affected by contamination and no flags were applied.

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	Reported:
Chicago IL, 60604	Project Manager: Paul Novak	Oct-03-17 17:18

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S01	1707007-01	Water	Jul-13-17 12:43	Jul-14-17 10:30
R02	1707007-02	Water	Jul-13-17 13:14	Jul-14-17 10:30

BOD, 5 day, SM 5210 B (modified)
US EPA Region 5 Chicago Regional Laboratory

S01 (1707007-01) **Matrix: Water** **Sampled: Jul-13-17 12:43** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Biochemical Oxygen Demand	40			2	mg/L	1	B17G022	Jul-14-17	Jul-14-17

R02 (1707007-02) **Matrix: Water** **Sampled: Jul-13-17 13:14** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Biochemical Oxygen Demand	U			2	mg/L	1	B17G022	Jul-14-17	Jul-14-17

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Oct-03-17 17:18

Notes and Definitions

U	Not Detected
NR	Not Reported
Q	QC limit Exceeded

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CHICAGO REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

LABORATORY ACCREDITATION BUREAU
ACCREDITED ISO/IEC 17025
Certificate # L2280 Testing

Date: 9/7/2017

Subject: Review of Region 5 Data for Ottawa Holsteins

To: Office of Enforcement and Compliance Assurance
77 W. Jackson
Chicago, IL 60604

From: Laurence Wong, SEEP Analyst
US EPA Region 5 Chicago Regional Laboratory

Analyst is a (check one): ✓ SEE Enrollee __ORISE Participant __Contractor
Grantee Organization or Contract Company: NAPCA
Assigned to the Chicago Regional Laboratory at U.S. EPA, Region 5
Reviewed by (initials, date): LW 9/8/17, chemist at Chicago Regional Laboratory

The data transmitted under this cover memo successfully passed CRL's data review procedures as documented in the current Quality Management Plan and applicable Standard Operating Procedures. In accordance with the EPA QA/G-8 *Guidance on Environmental Data Verification and Data Validation* and the U.S. EPA Region 5 RMD QMP, CRL performs data verification on all the data generated internally. CRL does not perform data validation or quality assessment procedures.

This report was reviewed and the information provided herein accurately represents the analysis performed.

X Laurence Wong September 7th, 2017

Please contact the analyst with any technical report issues, Robert Thompson at (312)-353-9078 for sample project concerns, and Sylvia Griffin at (312)-353-9073 with data transmittal questions. Thank you.

Attached are Results for: Ottawa Holsteins

/ /

Data Coordinator and Date Transmitted

Analyses included in this report:

Solids, TDS Solids, TSS

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	Reported:
Chicago IL, 60604	Project Manager: Paul Novak	Sep-07-17 17:02

ANALYSIS CASE NARRATIVE - TSS

General Information

Two (2) water samples under Work Order #1707007 were received on July 14, 2017 for Total Suspended Solids (TSS) analysis. The designated analyst was Laurence Wong; and the contact person, Francis Awanya (phone number: 312-886-3682).

The samples were received in good conditions: on ice, at 2.3°C. Their preparation and analysis began on July 18, 2017, following procedure CRL SOP AIG018 Version #3 (based on Standard Method 2540 D), and were completed on the following day July 19, 2017. The samples were kept in refrigerator at $\leq$ 6°C at all time except when in use. The sample holding time limit was met. Other pertinent information is provided in the final analysis report.

Sample Analysis and Results

The result of one sample (#1707001-01, client designation S01) was 127 mg/L. The second one (#1707001-02, client designation R02) was below the reporting limit of 5 mg/L.

No special client requirements were specified for this analysis, and all the QC audits were deferred to the CRL guidelines. The data reported herein meet the limits referenced in the afore-mentioned SOP and those in the file "FY 2017 General Field Sampling Plan 02132017" archived in the CAFO Folder, one of the 2017 QAPPs folders in the CRL's share drive..

Quality Control

All quality control (QC) audits followed CRL guidelines. The required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the CRL's QC limits.

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	Reported:
Chicago IL, 60604	Project Manager: Paul Novak	Sep-07-17 17:02

ANALYSIS CASE NARRATIVE - TDS

General Information

Two (2) water samples under Work Order #1707007 were received on July 14, 2017 for Total Dissolved Solids (TDS) analysis. The designated analyst was Laurence Wong; and the contact person, Francis Awanya (phone number: 312-886-3682).

The samples were received in good conditions: on ice, at 2.3°C. Their preparation and analysis began on July 18, 2017, and were completed on July 24, 2017, following procedure CRL SOP AIG017 Version #4 (based on Standard Method 2540 C). The samples were kept in refrigerator at ≤ 6°C at all-time except when in use. The sample holding time limit was met. Other pertinent information is provided in the final analysis report.

Sample Analysis and Results

One sample's result was less than the reporting limit of 20.0 mg/L (Sample #1707007-02, client designation R02). The other one was 412 mg/L (Sample #1707001-01, client designation S01).

There were no special client requirements specified for this analysis, and all the QC audits were deferred to the CRL guidelines. The data reported herein meet the limits referenced in the afore-mentioned SOP and those in the file "FY 2017 General Field Sampling Plan 02132017" archived in the CAFO Folder, one of the 2017 QAPPs folders in the CRL's share drive..

Quality Control

All quality control (QC) audits followed CRL guidelines. The required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the CRL's QC limits.

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Sep-07-17 17:02

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S01	1707007-01	Water	Jul-13-17 12:43	Jul-14-17 10:30
R02	1707007-02	Water	Jul-13-17 13:14	Jul-14-17 10:30

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	Reported:
Chicago IL, 60604	Project Manager: Paul Novak	Sep-07-17 17:02

Dissolved Solids, SM 2540C (modified)
US EPA Region 5 Chicago Regional Laboratory

S01 (1707007-01) **Matrix: Water** **Sampled: Jul-13-17 12:43** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Dissolved Solids	412			20.0	mg/L	1	B17G023	Jul-18-17	Jul-18-17

R02 (1707007-02) **Matrix: Water** **Sampled: Jul-13-17 13:14** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Dissolved Solids	U			20.0	mg/L	1	B17G023	Jul-18-17	Jul-18-17

Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone:(312)353-8370 Fax:(312)886-2591

Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	**Reported:**
Chicago IL, 60604	Project Manager: Paul Novak	Sep-07-17 17:02

Total Suspended Solids, SM 2540 D (modified)
US EPA Region 5 Chicago Regional Laboratory

S01 (1707007-01) **Matrix: Water** **Sampled: Jul-13-17 12:43** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Suspended Solids	127			5	mg/L	1	B17G024	Jul-18-17	Jul-18-17

R02 (1707007-02) **Matrix: Water** **Sampled: Jul-13-17 13:14** **Received: Jul-14-17 10:30**

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Suspended Solids	U			5	mg/L	1	B17G024	Jul-18-17	Jul-18-17

Environmental Protection Agency Region 5
Chicago Regional Laboratory

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Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	Reported:
Chicago IL, 60604	Project Manager: Paul Novak	Sep-07-17 17:02

Analyte	Result	Flags / Qualifiers	MDL	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit

Environmental Protection Agency Region 5
Chicago Regional Laboratory

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Office of Enforcement and Compliance Assurance	Project: Ottawa Holsteins	
77 W. Jackson	Project Number: CN-02-17	Reported:
Chicago IL, 60604	Project Manager: Paul Novak	Sep-07-17 17:02

Notes and Definitions

U	Not Detected
NR	Not Reported
Q	QC limit Exceeded

ATTACHMENT 7

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [N] [ ]	[ ]	[1][7][0][7][1][3]	[\]	[R]	[3]

Remarks

21 [ ] 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 [3][0][6] 69	70 [3]	71 [N]	72 [N]	73 [ ] 74 75 [ ] 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Ottawa Holsteins, L. L. C. 8283 Road 7D Ottawa, Ohio 45875	1029 17/07/13	
	Exit Time/Date	**Permit Expiration Date**
	1345 17/07/13	

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Hank Huskies - Owner's son (419) 890-9868	Dairy - no NPDES permit

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Jan Huskies - Owner (419) 890-9868 8283 Road 7D Ottawa, Ohio 45875	☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
✓ Effluent/Receiving Waters	✓ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
B O A I 9	BMP Deficiencies - not enough ~~freeboard~~ freeboard for pond (AM-9-17)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Paul J. Novak Jr.	U.S. EPA - R5 - OECA - Cleveland Section	17/10/17
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Mark Conti	EPA Cleveland Section (440) 250-1706	10-18-2017

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

- A Performance Audit
- B Compliance Biomonitoring
- C Compliance Evaluation (non-sampling)
- D Diagnostic
- F Pretreatment (Follow-up)
- G Pretreatment (Audit)
- I Industrial User (IU) Inspection
- J Complaints
- M Multimedia
- N Spill
- O Compliance Evaluation (Oversight)
- P Pretreatment Compliance Inspection
- R Reconnaissance
- S Compliance Sampling
- U IU Inspection with Pretreatment Audit
- X Toxics Inspection
- Z Sludge - Biosolids
- # Combined Sewer Overflow-Sampling
- $ Combined Sewer Overflow-Non-Sampling
- + Sanitary Sewer Overflow-Sampling
- & Sanitary Sewer Overflow-Non-Sampling
- \ CAFO-Sampling
- = CAFO-Non-Sampling
- 2 IU Sampling Inspection
- 3 IU Non-Sampling Inspection
- 4 IU Toxics Inspection
- 5 IU Sampling Inspection with Pretreatment
- 6 IU Non-Sampling Inspection with Pretreatment
- 7 IU Toxics with Pretreatment
- ! Pretreatment Compliance (Oversight)
- @ Follow-up (enforcement)
- { Storm Water-Construction-Sampling
- } Storm Water-Construction-Non-Sampling
- : Storm Water-Non-Construction-Sampling
- ~ Storm Water-Non-Construction-Non-Sampling
- < Storm Water-MS4-Sampling
- - Storm Water-MS4-Non-Sampling
- > Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

- A — State (Contractor)
- B — EPA (Contractor)
- E — Corps of Engineers
- J — Joint EPA/State Inspectors—EPA Lead
- L — Local Health Department (State)
- N — NEIC Inspectors
- O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
- P — Other Inspectors, State (Specify in Remarks columns)
- R — EPA Regional Inspector
- S — State Inspector
- T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

ATTACHMENT 8

FY 2018 MANUAL INSPECTION CONCLUSION DATA (ICDS) FORM

(Instructions and definitions for completing the information follow)

1. **Region:** 5 **Facility Name/Location:** Ottawa Holsteins, L.L.C.
8283 Road 7D, Ottawa, Ohio, 45875

2. **General Facility Permit ID or Media-Specific Permit ID number (e.g. NPDES permit #):**
_____

3. **SIC (4-digit):** 0241 **or** **NAICS Code (5-digit):**

4. **Date of Inspection:** 07/13/2017 (mm/dd/yyyy)

5. **Media Type** (check one only)
☐CAA-Stationary ☒CWA-NPDES ☐GLP ☐TSCA Lead Paint ☐CAA-Mobile Source
☐CAA-112(r) ☐RCRA Hazardous Waste ☐UST ☐TSCA core, PCBs, asbestos
☐CWA-Pretreatment (IU) ☐CWA 311 SPCC ☐CWA 404 Wetland ☐EPCRA 313
☐EPCRA non-313 ☐FIFRA

6. **Deficiencies:** Did you observe deficiencies during inspection? ☒Yes ☐No *[N/A is not allowed]*
a. If YES, go to #7
b. If NO, go to #9

7. **If YES:** Did you communicate the deficiencies to the facility during the inspection? ☒Yes ☐No

8. **Actions Taken:** Did you observe the facility take any actions during the inspection to address the deficiencies communicated? ☐Yes ☒No *[N/A is not allowed]*
a. If NO, go to #9
b. If YES, check the action(s) taken, or describe any other actions taken. (Check all that apply)

Action(s) Taken
_____ Verified compliance with previously issued enforcement action – part of all conditions
_____ Corrected recordkeeping deficiencies
_____ Corrected monitoring deficiencies
_____ Completed a notification or a report
_____ Requested a permit application
_____ Implemented new or improved management practices or processes
_____ Improved pollutant identification (e.g. labeling, manifesting, storage, etc.)
_____ Reduced pollution (e.g. use reduction, industrial process change, emissions or discharge change etc.) *Specify the pollutant(s) reduced only if this action is checked.*

Water: ☐Ammonia ☐BOD ☐COD ☐TSS ☐O/G ☐TC ☐DO ☐Metals ☐CN
Air: ☐NO_x ☐SO_2 ☐PM ☐VOC ☐Metals ☐HAPs ☐CO
List other observed or other pollutants reduced: _____

9. **Assistance:** Did you provide *general* assistance based on national policy? ☒Yes ☐No
Did you provide *site-specific* assistance based on national policy? ☒Yes ☐No
Note: EPA inspectors are **not** required to provide compliance assistance.

Optional Information: Describe actions taken or assistance provided to assist facility.
_____

NOTE TO EPA INSPECTORS

- The main purpose of EPA inspections/evaluations is to determine compliance with environmental regulations and enforcement agreements. Secondary purposes include providing a field presence to create a credible deterrent and providing assistance, when appropriate, to help facilities achieve compliance.
- The ICDS is used to identify observable corrections to deficiencies and compliance assistance activities. ICDS is **NOT** designed to capture all of the observations, findings, and other data contained in the final inspection report. Deficiencies identified as potential violations, and actions to address deficiencies noted on the ICDS must be included in the final EPA inspection report.
- ICDS information will be used to collect accomplishments of EPA's national inspection efforts, develop inspection outcomes for GPRA, and manage national compliance monitoring resources.
- The information will **NOT** be used to track individual EPA inspectors' performance.
- The ICDS should only be used for EPA-led inspections, not for state oversight inspections.

Instructions for Each Question

1. Region, Facility Name/Location: Enter the Region, and facility name/location (for unpermitted facilities).
2. Permit ID#: Enter either the Facility Registration System (FRS) permit ID or media-specific ID # (e.g., NPDES, CAA, or RCRA permit number).
3. SIC/NAICS Codes: Identify the SIC or NAICS code at (http://www.commerce.gov), (http://www.osha.gov/oshstats/sicser.html), (http://www.census.gov/epcd/www/naics.html), by CD-ROM (PB98-502024- NTIS (800-553-6847), or OC Inspector Website (http://intranet.epa.gov/oeca/inspector)
4. Date of Inspection: Enter the beginning date of the inspection (e.g., 04/10/2004)
5. Media Type: Check the environmental media program inspection being conducted.
6. Deficiencies: Check YES or NO. EPA inspectors should follow the regional policy on when and how to inform facilities of deficiencies. Deficiencies are defined as potential violations. Deficiencies are **NOT** compliance determinations (further review is needed to determine violations). A list of potential deficiencies is on the ICIS compliance monitoring screen (https://caribou.rtpnc.epa.gov/ICIS/).
7. Communication: Check YES or NO. N/A is not allowed.
8. Actions Taken: Check YES or NO. If YES, check only action(s) actually observed/seen, or write in a short description of the action in the "Other" section. These are **NOT** compliance determinations. Check the box to specify the pollutant: *Ammonia (NH3-N)* – ammonia nitrogen, ammonia as N, *BOD* – Biochemical Oxygen Demand, *COD* – Chemical Oxygen Demand, *TC* – Total Coliform, *TSS* – Total Suspended Solids, *SS* – Settleable Solids, *O/G* – Oil and Grease, *DO* – Dissolved Oxygen, NO_x – Nitrogen Oxides, SO_2 – Sulphur Dioxide, *PM* – Particulate Matter, *VOC* – Volatile Organic Compound, *CN* – Cyanide, *HAPs* – Hazardous Air Pollutants, *CO* – Carbon Monoxide, *Metals* – Hexavalent Chromium, Lead, Mercury, etc. Write in other pollutants if not listed. The Case Conclusion Data Sheet Training Booklet [November 2000] provides additional information on actions taken. The Training Booklet can be obtained by calling the Office of Compliance (202-564-6004).
9. Compliance Assistance: Inspectors are **not required** to provide compliance assistance during inspections. Check YES or NO to the two questions. General compliance assistance involves distributing prepared information on regulatory compliance, P2 or other written materials/websites. Refer to National Policy: Role of the EPA Inspector in Providing Compliance Assistance During Inspections, June 2003 for more information for examples of site-specific assistance. The policy is available on the EPA website (www.epa.gov), the Inspector Website (http://intranet.epa.gov/oeca/inspector), or calling (202-564-2300).

Data Collection Process

- Inspectors must complete the ICDS **immediately** after the inspection is conducted.
  Inspector should forward completed forms to first-line supervisor/designated alternate within five (5) days after returning from either a single inspection, or a series of inspections.
- The first-line supervisor/designated alternate must review the ICDS for completeness and accuracy and compile the ICDS information by media program to report ICDS results using the consolidated manual reporting form. The consolidated manual reporting form will be sent to HQ for **mid-year 2005 & end-of-year 2005 reporting.**